



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I

JOHN F. KENNEDY FEDERAL BUILDING (HBT)  
BOSTON, MASSACHUSETTS 02203-2211

N60087.AR.000673  
NAS BRUNSWICK  
5090.3a

February 24, 1998

Mr. Emil Klawitter  
Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
Code 1823/EK  
10 Industrial Highway, Mailstop 82  
Lester, PA 19113-2090  
(eeklawitter@efdnorth.navfac.navy.mil)

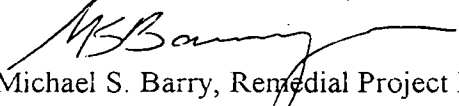
Re: Naval Air Station, Brunswick, Maine  
*Draft Record of Decision for Site 2*

Dear Mr. Klawitter:

Thank you for the opportunity to review and comment to the draft Record of Decision (ROD) for Site 2. The U.S. Environmental Protection Agency (EPA) is in general concurrence with the draft ROD, subject to resolution of the attached comments. I look forward to working with you to finalize this ROD and then developing the Long Term Monitoring Plan for site 2.

This letter will also be sent by E-mail as an attached file in Word Perfect version 6.1 and fax. Please call me at 617-223-5579 or E-mail me at [barry.michael@epamail.epa.gov](mailto:barry.michael@epamail.epa.gov) for any questions. In event you cannot read this application or have problems downloading this letter, I can translate it into to ms word ver 2.0/ver 6.0 or word perfect ver 5.1.

Sincerely,

  
Michael S. Barry, Remedial Project Manager  
Federal Superfund Facilities Section

Attachment

Cc. (by US Mail only unless otherwise indicated)  
Jim Caruthers/NASB  
Claudia Sait/ME DEP (also email to [claudia.b.sait@state.me.us](mailto:claudia.b.sait@state.me.us))  
Susan Weddle/BACSE  
Carolyn LePage/LePage Environmental (also by email to [clepageges@aol.com](mailto:clepageges@aol.com))  
Rene Bernier/Topsham Community Rep.  
Charles MacLeod/EA Environmental  
Jeffery Brandow/ABB-ES

## ATTACHMENT

The following are the EPA's comments to the draft Record of Decision for Site 2 for Naval Air Station, Brunswick, Maine.

### GENERAL COMMENTS

1. Five-year Reviews. The EPA would like to state that on federal facilities the five-year review covers all operable units on the facility where decision documents have been finalized and a five-year review was required. For NAS Brunswick, the EPA considers 1995 as the beginning of the clock for a five-year review. Therefore, preparations should be made to conduct a five-year review on all OUs in the year 2000.

### SPECIFIC COMMENTS

1. Page 3, 3rd Bullet. Suggest deleting this bullet since modifications are discussed in the following paragraph.
2. Decision Summary, page 6. A more detailed figure of the site is needed to orient the reader to physical features referenced in the text. This figure should include topographical contours, monitoring wells, leachate seep sample locations and Mere Brook.
3. Page 15, 6th Bullet. Suggest deleting this bullet since modifications are discussed in the following paragraph.
4. Summary of site characteristics, page 18, first paragraph. Please cite the concentrations of lead that exceeded federal MCL and state MEG for reference and clarity.
5. Page 28, 5th Bullet. Suggest deleting this bullet since modifications are discussed in the following paragraph.
6. Page 30, Section IX.B. It is note that chemical specific ARARs are listed, however technically ARARs are not triggered if the risk is below the EPA criteria of  $10^{-6}$  or an  $HI < 1$ . However for the purposes of this ROD, I think we can allow the groundwater and surface water requirements to be listed. Adding a note that the ARAR's are listed at table C-1 would be helpful to the reader.